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*[Signature]*  
November 17, 2015 1/6/15

**CONTAINS NO CBI**

**CBIC Control Number**  
**366996**

**VIA FEDEX**

TSCA Confidential Business Information Center (7407M)  
EPA East – Room 6428 Attn: Section 8(e)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460-0001

**Re: Submission of Information Concerning Allegations of Environmental Contamination, Case No. 8EHQ-14-19758**

Dear TSCA Section 8(e) Coordinator:

On behalf of Saint-Gobain Performance Plastics Corporation (SGPP), we are submitting this notice to provide information to the U.S. Environmental Protection Agency (EPA) concerning data regarding the presence of perfluorooctanoic acid (PFOA) in soil and groundwater samples at the SGPP McCaffrey Street Manufacturing Facility in Hoosick Falls, New York. SGPP processes fluoropolymers at the Hoosick Falls Facility that were made with ingredients containing PFOA. SGPP is not and has never been a manufacturer or distributor of PFOA. Since 2003, SGPP has participated in the industry's voluntary PFOA phase-out effort by purchasing raw materials with decreasing levels of PFOA as an ingredient.

On December 30, 2014, SGPP provided notice pursuant to Section 8(e) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2607(e), that SGPP was aware of PFOA measurements conducted by the Village of Hoosick Falls in three wells used to supply drinking water to the community. SGPP reported that the measurement from one well exceeded EPA's provisional health advisory (PHA) level for PFOA of 0.4 micrograms per Liter in drinking water. SGPP had no information as to whether this finding presented a significant risk of injury to human health or the environment. SGPP reported this information to EPA out of an abundance of caution and as a matter of good product stewardship.

In response to this finding, SGPP undertook a Phase I Investigation at SGPP's Hoosick Falls, McCaffrey Street Facility to determine whether PFOA was present in soil or groundwater underneath the Facility. PFOA was detected in five soil samples taken at the Facility but at concentrations that are below published EPA risk-based screening levels for residential and industrial sites. PFOA was also detected in groundwater at concentrations that exceed EPA's 0.4

TSCA Confidential Business Information Center (7407M)

November 17, 2015

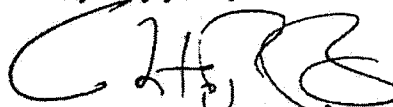
Page 2

micrograms per Liter PHA for PFOA. The highest concentration of PFOA was detected in an upgradient well. SGPP is enclosing the soil and groundwater sampling results with this letter.

SGPP has no information as to whether these findings actually present a significant risk of injury to human health or the environment. SGPP is reporting this information under Section 8(e) of TSCA out of an abundance of caution and as part of SGPP's continued commitment to caring for the environment.

If you have any questions regarding these findings or the information reported in this letter, please contact Lauren Alterman, Vice President Environment, Health & Safety for Saint-Gobain Corporation (parent of Saint-Gobain Performance Plastics Corporation) at (610) 893-5946.

Very truly yours,



CHRISTOPHER R. GIBSON

CRG: MTC

Enclosure

cc: Ms. Lauren Alterman, Saint-Gobain

**CONTAINS NO CBI**

113053078v1

CONTAINS NO CBI

CBI



**LEGEND**

- SITE PROPERTY BOUNDARY (APPROXIMATE)
- BUILDING OUTLINE
- TREELINE
- HOOSICK RIVER GREENWAY
- TRANSFORMER (PAD MOUNTED)
- ⊕ MW-15 MONITORING WELL IN PERCHED ZONE
- ⊙ MW-2 MONITORING WELL

**SOURCES**  
 1. AERIAL IMAGERY: BWS MAPS  
 2. SURVEY PLAN: CTMAE AND ASSOC. INC. BS-61, GORAIN DWD, AUGUST 27, 2015  
 3. PUMP STATION AND ASSOCIATED UTILITIES: 1968 VROCKMAN SEWER AND PUMP STATION PLAN  
 4. 2002 CHA UNDERGROUND UTILITY PLAN

0 80  
SCALE IN FEET

**FIGURE**

**1**

PROJECT: 023712BA

**SOIL AND GROUNDWATER SAMPLE LOCATIONS**

SAINT GOBAIN PERFORMANCE PLASTICS  
 McCAFFREY STREET PLANT  
 HOOSICK FALLS, NY

P:\ALGONA\1012015\023712A\TECHNICAL\OCT 2015 (REV) - CHA\_HOOSICK FALLS NY\_023712A

DRAFTED BY: KFM

DATE: 10/10/2015

10/30/2015

**TABLE 1**  
**Summary of Soil Sampling Results**  
**SGPP Hoosick Falls**

Location	USEPA Region 4 Residential Screening Levels [2]	MW-1		MW-2		
Field Sample ID		SG1-MW01D-00.0	SG1-MW01D-02.0	SG1-MW02D-00.0	SG1-DS01-150805	SG1-MW02D-02.0
Collection Depth (ft bgs)		0 - 2	2 - 4	0 - 2	0 - 2	2 - 4
Sampling Date		8/10/2015	8/10/2015	8/5/2015	8/5/2015	8/5/2015
Comments				Field Duplicate		Laboratory Duplicate
<b>PHYS</b>						
Moisture [%]		11	9.6	11	11	N/A
<b>PFCS</b>						
Perfluorobutane Sulfonate (PFBS)		U (0.014)	U (0.014)	U (0.014)	U (0.014)	U (0.014)
Perfluoroheptanoic Acid (PFHpA)		U (0.015)	U (0.015)	U (0.015)	U (0.015)	U (0.015)
Perfluorohexane Sulfonate (PFHxS)		U (0.015)	U (0.015)	U (0.015)	U (0.015)	U (0.015)
Perfluoro-n-Octanoic Acid (PFOA)	16000	1.0	2.4	1.3	1.5	0.35
Perfluorononanoic Acid (PFNA)		U (0.01)	U (0.01)	0.01	0.02	U (0.01)
Perfluorooctane Sulfonate (PFOS)	6000	U (0.015)	U (0.015)	0.028	0.035	U (0.015)

**Notes:**

1. All units in ug/kg (ppb) except where otherwise noted.
2. USEPA Region 4. 2009. "Soil Screening Levels for Perfluorooctanoic Acid (PFOA) and Perfluorooctyl Sulfonate (PFOS)."

**Abbreviations:**

U -- Not Detected  
 ( ) -- Method Detection Limit  
 N/A -- Not Analyzed

CONTAINS NO CBI

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**TABLE 1**  
**Summary of Soil Sampling Results**  
**SGPP Hoosick Falls**

Location	USEPA Region 4 Residential Screening Levels [2]	MW-3		MW-4		MW-5	
Field Sample ID		SG1-MW03S-00.0	SG1-MW03S-02.0	SG1-MW04S-00.0	SG1-MW04S-02.0	SG1-MW05S-00.0	SG1-MW05S-02.0
Collection Depth (ft bgs)		0 - 2	2 - 4	0 - 2	2 - 4	0 - 2	2 - 4
Sampling Date		8/13/2015	8/13/2015	8/5/2015	8/5/2015	8/11/2015	8/11/2015
Comments							
<b>PHYS</b>							
Moisture [%]		14	16	22	25	12	15
<b>PFCS</b>							
Perfluorobutane Sulfonate (PFBS)		U (0.014)	U (0.014)	0.039	U (0.014)	U (0.14)	U (0.014)
Perfluoroheptanoic Acid (PFHpA)		0.11	U (0.015)	0.17	0.080	U (0.15)	0.038
Perfluorohexane Sulfonate (PFHxS)		U (0.015)	U (0.015)	0.15	U (0.015)	U (0.15)	U (0.015)
Perfluoro-n-Octanoic Acid (PFOA)	16000	2.5	0.67	4.1	1.8	1.4	1.2
Perfluorononanoic Acid (PFNA)		0.11	0.03	0.14	0.07	U (0.1)	0.06
Perfluorooctane Sulfonate (PFOS)	6000	0.19	0.018	0.63	0.28	0.25	0.099

**Notes:**

- 1 All units in ug/kg (ppb) except where otherwise noted.
- 2 USEPA Region 4, 2009, "Soil Screening Levels for Perfluorooctanoic Acid (PFOA) and Perfluorooctyl Sulfonate (PFOS)."

**Abbreviations:**

U -- Not Detected  
( ) -- Method Detection Limit  
N/A -- Not Analyzed

CONTAINS NO CBI

10/30/2015

**TABLE 2**  
**Summary of Groundwater Sampling Results**  
**SGPP Hoosick Falls**

Location	USEPA Drinking Water Provisional Health Advisory Levels (3)	NYSDOH Unspecified Organic Contaminant Criteria (4)	MW-1		MW-1S	
Field Sample ID			SG1-MW01-150903	SG1-MW01-151001	SG1-MW01S-150903	SG1-MW01S-151001
Sample Date			9/3/2015	10/1/2015	9/3/2015	10/1/2015
Comments						
<b>PFCS</b>						
Perfluorobutane Sulfonate (PFBS)		50000	U (8.5)	U (8.5)	U (8.5)	U (8.5)
Perfluoroheptanoic Acid (PFHpA)		50000	U (2.2)	U (2.2)	20 (2.2)	60 (2.2)
Perfluorohexane Sulfonate (PFHxS)		50000	U (2.9)	U (2.9)	U (2.9)	U (2.9)
Perfluoro-n-Octanoic Acid (PFOA)	400	50000	U (1.6)	U (1.6)	U (1.6)	60 (1.6)
Perfluorononanoic Acid (PFNA)		50000	U (2.3)	U (2.3)	U (2.3)	U (2.3)
Perfluorooctane Sulfonate (PFOS)	200	50000	U (2.1)	U (2.1)	U (2.1)	U (2.1)

**Notes:**

- 1 All concentrations are presented in ng/L (ppb).
- 2 Detected concentrations exceeding a comparison criterion are shown in **bold text**.
- 3 USEPA. Provisional Health Advisories for perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonate (PFOS). 2009.
- 4 NYSDOH, 2011. Table 3 – Organic Chemicals, Maximum Contaminant Level Determination. Part 5, Subpart 5-1 Public Water Systems. November.  
[https://www.health.ny.gov/regulations/nycrr/title\\_10/part\\_5/subpart\\_5-1\\_tables.htm](https://www.health.ny.gov/regulations/nycrr/title_10/part_5/subpart_5-1_tables.htm)
- 5 A split sample from MW-02 was submitted for laboratory analysis to Maxxam Analytics of Mississauga, Ontario, Canada. All other samples were submitted for laboratory analysis to Eurofins/Eaton Analytical of South Bend, IN.

**Abbreviations:**

U -- Not Detected.  
 ( ) -- Detection Limit.



10/30/2015

**TABLE 2**  
**Summary of Groundwater Sampling Results**  
**SGPP Hoosick Falls**

Location	USEPA Drinking Water Provisional Health Advisory Levels (3)	NYSDOH Unspecified Organic Contaminant Criteria (4)	MW-2			MW-2S	
Field Sample ID			SG1-MW02-150902	SG1-MW02-150930	SG1-MW02-150930	SG1-MW02S-150902	SG1-MW02S-151001
Sample Date			9/2/2015	9/30/2015	9/30/2015	9/2/2015	10/1/2015
Comments					Split Sample (5)		
<b>PFCS</b>							
Perfluorobutane Sulfonate (PFBS)		50000	U (8.5)	U (8.5)	U (4.7)	U (8.5)	U (8.5)
Perfluoroheptanoic Acid (PFHpA)		50000	340 (2.2)	310 (2.2)	390 (5.4)	20 (2.2)	30 (2.2)
Perfluorohexane Sulfonate (PFHxS)		50000	U (2.9)	U (2.9)	U (5.4)	U (2.9)	U (2.9)
Perfluoro-n-Octanoic Acid (PFOA)	400	50000	18000 (1.6)	17000 (1.6)	16000 (180)	1100 (1.6)	750 (1.6)
Perfluorononanoic Acid (PFNA)		50000	U (2.3)	U (2.3)	U (6.3)	U (2.3)	U (2.3)
Perfluorooctane Sulfonate (PFOS)	200	50000	U (2.1)	U (2.1)	U (3.7)	U (2.1)	U (2.1)

**Notes:**

- 1 All concentrations are presented in ng/L (ppb).
- 2 Detected concentrations exceeding a comparison criterion are shown in bold text.
- 3 USEPA, Provisional Health Advisories for perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonate (PFOS), 2009.
- 4 NYSDOH, 2011. Table 3 – Organic Chemicals, Maximum Contaminant Level Determination. Part 5, Subpart 5-1 Public Water Systems. November.  
[https://www.health.ny.gov/regulations/nycrr/title\\_10/part\\_5/subpart\\_5-1\\_tables.htm](https://www.health.ny.gov/regulations/nycrr/title_10/part_5/subpart_5-1_tables.htm)
- 5 A split sample from MW-02 was submitted for laboratory analysis to Maxxam Analytics of Mississauga, Ontario, Canada. All other samples were submitted for laboratory analysis to Eurofins/Eaton Analytical of South Bend, IN.

**Abbreviations:**

U -- Not Detected.  
 ( ) -- Detection Limit.

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10/30/2015

**TABLE 2**  
**Summary of Groundwater Sampling Results**  
**SGPP Hoosick Falls**

	Location	USEPA Drinking Water Provisional Health Advisory Levels (3)	NYSDOH Unspecified Organic Contaminant Criteria (4)	MW-3			MW-4		
	Field Sample ID			SG1-MW03-150903	SG1-DS01-150903	SG1-MW03-151001	SG1-MW04-150903	SG1-MW04-151001	SG1-DS01-151001
	Sample Date			9/3/2015	9/3/2015	10/1/2015	9/3/2015	10/1/2015	10/1/2015
	Comments			Field Duplicate			Field Duplicate		
PFCs									
Perfluorobutane Sulfonate (PFBS)		50000	U (8.5)	U (8.5)	U (8.5)	U (8.5)	U (8.5)	U (8.5)	
Perfluoroheptanoic Acid (PFHpA)		50000	130 (2.2)	130 (2.2)	120 (2.2)	40 (2.2)	40 (2.2)	40 (2.2)	
Perfluorohexane Sulfonate (PFHxS)		50000	U (2.9)	U (2.9)	U (2.9)	U (2.9)	U (2.9)	U (2.9)	
Perfluoro-n-Octanoic Acid (PFOA)	400	50000	5300 (1.6)	4200 (1.6)	4300 (1.6)	1700 (1.6)	1400 (1.6)	1400 (1.6)	
Perfluorononanoic Acid (PFNA)		50000	U (2.3)	U (2.3)	U (2.3)	U (2.3)	U (2.3)	U (2.3)	
Perfluorooctane Sulfonate (PFOS)	200	50000	U (2.1)	U (2.1)	U (2.1)	U (2.1)	U (2.1)	U (2.1)	

**Notes:**

- 1 All concentrations are presented in ng/L (ppb).
- 2 Detected concentrations exceeding a comparison criterion are shown in **bold text**.
- 3 USEPA. Provisional Health Advisories for perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonate (PFOS). 2009.
- 4 NYSDOH, 2011. Table 3 - Organic Chemicals, Maximum Contaminant Level Determination. Part 5, Subpart 5-1 Public Water Systems. November.  
[https://www.health.ny.gov/regulations/nycir/title\\_10/part\\_5/subpart\\_5-1\\_tables.htm](https://www.health.ny.gov/regulations/nycir/title_10/part_5/subpart_5-1_tables.htm)
- 5 A split sample from MW-02 was submitted for laboratory analysis to Maxxam Analytics of Mississauga, Ontario, Canada. All other samples were submitted for laboratory analysis to Eurofins/Eaton Analytical of South Bend, IN.

**Abbreviations:**

U -- Not Detected.  
 ( ) -- Detection Limit.

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10/30/2015

TABLE 2  
Summary of Groundwater Sampling Results  
SGPP Hoosick Falls

Location	Field Sample ID	USEPA Drinking Water Provisional Health Advisory Levels (3)	NYSDOH Unspecified Organic Contaminant Criteria (4)	MW-5	
				SG1-MW05-150903	SG1-MW05-151001
Sample Date				9/3/2015	10/1/2015
Comments					
<b>PFCS</b>					
Perfluorobutane Sulfonate (PFBS)			50000	U (8.5)	U (8.5)
Perfluoroheptanoic Acid (PFHpA)			50000	10 (2.2)	10 (2.2)
Perfluorohexane Sulfonate (PFHxS)			50000	U (2.9)	U (2.9)
Perfluoro-n-Octanoic Acid (PFOA)		400	50000	<b>580 (1.6)</b>	<b>570 (1.6)</b>
Perfluorononanoic Acid (PFNA)			50000	U (2.3)	U (2.3)
Perfluorooctane Sulfonate (PFOS)		200	50000	U (2.1)	U (2.1)

**Notes:**

- 1 All concentrations are presented in ng/L (ppb).
- 2 Detected concentrations exceeding a comparison criterion are shown in **bold text**.
- 3 USEPA. Provisional Health Advisories for perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonate (PFOS). 2009.
- 4 NYSDOH, 2011. Table 3 – Organic Chemicals, Maximum Contaminant Level Determination. Part 5, Subpart 5-1 Public Water Systems. November.  
[https://www.health.ny.gov/regulations/nycrr/title\\_10/part\\_5/subpart\\_5-1\\_tables.htm](https://www.health.ny.gov/regulations/nycrr/title_10/part_5/subpart_5-1_tables.htm)
- 5 A split sample from MW-02 was submitted for laboratory analysis to Maxxam Analytics of Mississauga, Ontario, Canada. All other samples were submitted for laboratory analysis to Eurofins/Eaton Analytical of South Bend, IN.

**Abbreviations:**

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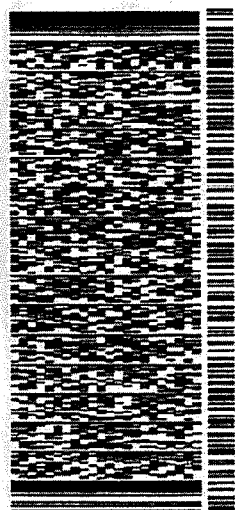
ORIGIN ID: WRIA (059) 795-2121  
 CHRISTOPHER R. GIBSON, ESQ.  
 ARCHER & GIBSON  
 ONE CENTENNIAL SQUARE  
 HADDONFIELD, NJ 08033  
 UNITED STATES US

SHIP DATE: 17NOV15  
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## TO SECTION 8 (E)

TSCA CONFIDENTIAL BUSINESS INFO  
 U.S. ENVIRONMENTAL PROTECTION AGENCY  
 1200 PENNSYLVANIA AVE, NW  
 WASHINGTON DC 20460  
 (202) 564-4700 REF: SA-055-801  
 PO INV 0697

539126F566100



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fax 202.434.4646

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Writer's Direct Access  
**David G. Sarvadi**  
(202) 434-4249  
sarvadi@khilaw.com

May 8, 2015

**Via Hand Delivery**

TSCA Confidential Business Information  
Center (7407M)

Attn: Section 8(e)  
1201 Constitution Avenue, NW  
WJC East; Room 6428  
Washington, DC 20004-3302

**CONTAINS NO CBI**

**Re: Submission of Supplemental Information Concerning Allegations of  
Environmental Contamination; TSCA Section 8(e) Case Number 8EHQ-  
14-19758**

Dear TSCA Section 8(e) Coordinator:

On behalf of our client, Saint-Gobain Performance Plastics Corporation (SGPP), we are submitting supplemental information following up on our previous reports under section 8(e) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2607(e), concerning the presence of perfluorooctanoic acid (PFOA) detected in tests of the public drinking water supplies of the Village of Hoosick Falls, New York (the Village). The U.S. Environmental Protection Agency (EPA) has assigned this case number 8EHQ-14-19758.

As we previously reported, testing of the Village of Hoosick Falls public drinking water supplies was originally sponsored by the Village. We reported the findings of this testing on December 30, 2014. SGPP subsequently contracted with a local consultant to re-test the public drinking water supplies in conjunction with the Village. Split samples collected at the same time were sent to each of two EPA-certified laboratories for analysis using EPA Method 537. The same laboratory that analyzed the previous samples reported results consistent with its earlier findings. The second laboratory reported results approximately two times higher than those from the first laboratory. We reported these results to EPA on March 17, 2015, and noted that due to the discrepancy between these results, we asked both laboratories to review their sample handling, laboratory procedures, calculations, and quality assurance and quality control (QA/QC) procedures.

**KELLER AND HECKMAN LLP**

TSCA Confidential Business Information Center (7407M)

May 8, 2015

Page 2

Based on this review, we are writing today to report that the second laboratory, which reported results twice as high as the first laboratory, has informed us that it believes there was a problem with their results. We are considering our next steps in light of this information.

SGPP has no information as to whether a significant risk of injury to human health or the environment is actually presented by the findings. Nonetheless, out of an abundance of caution and as a matter of good product stewardship we think it prudent to submit this information to EPA under section 8(e) of TSCA.

We trust that the Agency finds this information useful. If you have any questions, please contact Lauren Alterman, Vice President – Health, Safety & Environment of Saint-Gobain Corporation (parent company of SGPP), at (610) 341-7838.

Respectfully submitted,



David G. Sarvadi  
Counsel to Saint-Gobain

cc: Ms. Lauren Alterman, Saint-Gobain  
Corporation

**CONTAINS NO CBI**

LAW OFFICES  
KELLER AND HECKMAN LLP  
1001 G STREET, N.W.  
SUITE 500 WEST  
WASHINGTON, D.C. 20001

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**TO:**

TSCA Confidential Business Information  
Center (7407M)  
Attn: Section 8(e)  
1201 Constitution Avenue, NW  
WJC East; Room 6428  
Washington, DC 20004-3302

